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7 Attorneys for Defendants
ALTA BATES SUMMIT MEDICAL CENTER,
8 RUSSELL D. STANTEN, M.D., LEIGH I.G.
IVERSON, M.D., STEVEN A. STANTEN, M.D., and
9 WILLIAM M. ISENBERG, M.D., Ph.D.

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12

13 COYNESS L. ENNIX, JR., M.D., as an
individual and in his representative capacity
14 under Business & Professions Code Section
17200 et seq.,

15 Plaintiff,

16 v.

17 RUSSELL D. STANTEN, M.D., LEIGH I.G.
18 IVERSON, M.D., STEVEN A. STANTEN,
M.D., WILLIAM M. ISENBERG, M.D.,
19 Ph.D., ALTA BATES SUMMIT MEDICAL
CENTER and does 1 through 100,

20 Defendants.
21

CASE NO. C 07-2486 WHA

**SUPPLEMENTATION OF
DEFENDANTS' INITIAL
DISCLOSURES**

JUDGE: Hon. William H. Alsup

COMPLAINT FILED: May 9, 2007
TRIAL DATE: June 2, 2008

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23 In accordance with Civ. R. 26 (a) (1) and the Court's 8/16/07 Case
24 Management Order, Defendants provide the following supplemental initial disclosures.

25 **A. Rule 26 (a) (1) (A) Identification of Individuals with Discoverable**
26 **Information**

27 35. John A. Etchevers. Two Embarcadero Center, Suite 1800, San
28 Francisco, CA 94111. Mr. Etchevers has information concerning Plaintiff's agreement to

1 certain practice restrictions in lieu of requesting a hearing under the Medical Center's
2 Bylaws and other issues relating to his representation of Dr. Ennix regarding the peer
3 review process placed at issue by Plaintiff's complaint.

4 **B. Rule 26 (a) (1) (B) Identification of Documents**

5 37. Pleadings and other case file material, including deposition
6 transcripts, from the case of *Tong v. Medtronic, Inc. and Coyness Ennix, M.D.*, (Alameda
7 Superior Court No. RG05197579).

8 DATED: August ^{23rd}, 2007

KAUFF McCLAIN & McGUIRE LLP

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10 By: 

MAUREEN E. McCLAIN

11
12 Attorneys for Defendants
13 ALTA BATES SUMMIT MEDICAL
14 CENTER, RUSSELL D. STANTEN, M.D.,
LEIGH I.G. IVERSON, M.D., STEVEN A.
STANTEN, M.D., and WILLIAM M.
ISENBERG, M.D., Ph.D.

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PROOF OF SERVICE

I, Rita I. Chavez, declare:

I am a resident of the State of California and over the age of eighteen years, and not a party to the within action; my business address is One Post Street, Suite 2600, San Francisco, California 94104. On August 27, 2007, I served the within documents:

SUPPLEMENTATION OF DEFENDANTS' INITIAL DISCLOSURES

- ☒ by transmitting via facsimile the document(s) listed above to the fax number(s) set forth below on this date before 5:00 p.m.
- ☒ by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at San Francisco, California addressed as set forth below.
- ☐ by placing the document(s) listed above in a sealed _____ envelope and affixing a pre-paid air bill, and causing the envelope to be delivered to a _____ agent for delivery.
- ☐ by personally delivering the document(s) listed above to the person(s) at the address(es) set forth below.

G. Scott Emblidge, Esq.
Moscone, Emblidge & Quadra, LLP
220 Montgomery Street, Suite 2100
San Francisco, CA 94104
(415) 362-2006

I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on August 27, 2007, at San Francisco, California.



Rita I. Chavez